From:

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Date:

Wed, May 16, 2007 11:45 PM

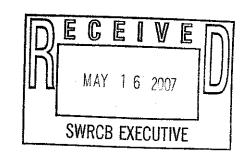
Subject:

Comment Letter -- Suction Dredge Mining

To the Hon. Song Her, Clerk to the Board:

The purpose of this e-mail comment letter is to focus on a particular aspect of suction dredge mining that often is overlooked in regard to effects on water quality. Specifically, this comment letter addresses the positive role of suction dredge mining as a valuable resource in the voluntary, no-cost removal of mercury, lead, copper and other toxic metals from California's rivers. Secondarily, this comment letter offers a suggestion that is designed to encourage the voluntary removal of toxic metals from California's waters.

- 1. It is generally accepted that mercury, lead and other heavy metals are toxic and harmful to all life forms and ultimately work their way up the food chain.
- 2. It is generally accepted that vast quantities of mercury found their way into California's river beds during a century of unregulated mining activity and that this mercury has accumulated in bedrock cracks and fissures, is not easily dislodged by natural forces, but is removable by vacuuming the bedrock by means of a suction dredge which acts as a filter and captures heavy metals, including mercury, some of which is amalgamated with natural gold.
- 3. Likewise many tons of toxic lead have accumulated in California riverbeds where it slowly leaches and is absorbed by the water. The source of this lead largely is attributable to hunting and is in the form of bullets and birdshot which lodges in bedrock cracks and crevices. Other sources include fishermen and river rafters who lose lead weights or accidentally drop cameras, cell phones or other circuitboard containing materials into the rivers.
- 4. Although much study is ongoing, there are no known publicly funded or public agency physical removal operations of any significance at work to actually clean the bedrock of California's rivers and streams of toxic contaminants such as mercury or lead.
- 5. Suction dredge miners pay a substantial fee for an annual permit to dredge on their federal mining claims located in California's rivers.
- 6. In the course of dredging operations significant amounts of mercury and lead are removed each year from the bedrock and gravels of California's waterways at



6/12/07 Workshop Suction Dredge Mining Deadline: 6/22/07 Noon no cost to the public.

- 7. This is the only known activity that substantially contributes to the actual cleansing of river bottom bedrock cracks and fissures.
- 8. A suggested incentive plan would be for the State of California Water Boards to offer a reward equal in value to the full or partial cost of the annual dredge permit fee upon the delivery of toxic mercury, lead or other harmful metals that a dredge permit holder has removed from California's rivers at the end of each dredge season.
- By working together, instead of at cross-purposes, public officials and suction dredge miners can significantly improve California's water quality.

Thank you for considering the contents of this comment letter.

Martin H. Milas, Life-long environmentalist and occasional dredger.

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